

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A
(Proposed Order)

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbbkllp.com)

DARA L. SILVEIRA (Cal. Bar No. 274923)
(dsilveira@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, California 94108

Telephone: (415) 496-6723

Facsimile: (650) 636-9251

GOODWIN PROCTER LLP

BRETT M. SCHUMAN (Cal. Bar No. 189247)

(BSchuman@goodwinlaw.com)

JENNIFER BRIGGS FISHER (Cal. Bar No. 241321)

(JFisher@goodwinlaw.com)

Three Embarcadero

San Francisco, California 94111

Telephone: (415) 733-6000

Facsimile: (415) 677-9041

Attorneys for Appellees

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:

ANTHONY SCOTT LEVANDOWSKI,

Reorganized Debtor.

Case Nos. 4:22-cv-02781-YGR;
4:22-cv-02783-YGR;
4:22-cv-02786-YGR; and
4:22-cv-02789-YGR
(Jointly Administered)

On Appeal from Bankruptcy Court
Case No. 3:20-bk-30242-HLB

The United States of America, on behalf of the
Internal Revenue Service, and California
Franchise Tax Board,

Appellants,

v.

The Levandowski Residual Liquidation Trust, as
successor to the Debtor in Possession, and
Anthony S. Levandowski,

Appellees.

**PROPOSED ORDER ON APPELLEES'
MOTION PURSUANT TO FEDERAL
RULE OF BANKRUPTCY
PROCEDURE 8009(f) FOR
ACCEPTANCE OF DOCUMENTS
FILED UNDER SEAL**

[No Hearing Requested]

1 Upon consideration of *Appellees' Motion Pursuant to Federal Rule of Bankruptcy*
2 *Procedure 8009(f) for Acceptance of Documents Filed Under Seal* (the "Sealed Document
3 Motion"); the Declaration of Dara L. Silveira filed in support of the Sealed Document Motion;
4 and having concluded that no hearing on the Sealed Document Motion is necessary;

5 **IT IS HEREBY ORDERED THAT** the Sealed Document Motion is granted; and

6 **IT IS FURTHER ORDERED THAT** this Court shall accept the unsealed and
7 unredacted versions of the documents identified in the Sealed Document Motion; and

8 **IT IS FURTHER ORDERED THAT** Appellees shall file a notice of this order in Case
9 No. 3:20-bk-30242-HLB (the "Bankruptcy Case"); and

10 **IT IS FURTHER ORDERED THAT** counsel for Appellees shall alert the clerk of the
11 court in which the Bankruptcy Case is pending of this Order.

12 ** END OF ORDER **